

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**SECOND SUPPLEMENTAL DECLARATION OF JOHN ARRASTIA REGARDING
RETENTION OF CONTINENTAL PLLC AS SPECIAL LITIGATION AND
CONFLICTS COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

I, John Arrastia, hereby declare under penalty of perjury:

1. I am a partner in the law firm of Continental PLLC ("Continental") with offices in Florida and Washington D.C., including 255 Alhambra Circle, Ste 640, Coral Gables, Fl 33134, and am admitted to practice in the State of Florida. The facts set forth in this supplemental declaration (the "Second Supplemental Declaration") are based upon my personal knowledge, discussions with other Continental attorneys, and the firm's client/matter records that were reviewed by me or other Continental attorneys acting under my supervision and direction.

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. On January 19, 2022, the Court entered an order [Docket No. 19813] confirming the *Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority* (the “Plan”). The effective date of the Plan occurred on March 15, 2022.

3. On February 28, 2022, I submitted a declaration (the “Initial Declaration”) in support of the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing the Employment and Retention of Continental PLLC as Substitute Special Litigation Counsel to Official Committee of Unsecured Creditors, Effective as of February 14, 2002* [Docket No. 20222] (the “Retention Application”)² filed by the Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico in the above-captioned cases.

4. By order of this Court entered March 18, 2022 [Docket No. 20407] (the “Retention Order”), Continental’s retention as counsel for the Committee was approved effective as of February 14, 2022.

Review and Disclosure of Additional Interested Parties

5. As more fully set forth in the May 13, 2022 *First Supplemental Declaration of John Arrastia Regarding Retention of Continental PLLC as Special Litigation and Conflicts Counsel to Official Committee of Unsecured Creditors* (“First Declaration”) [DE 20776], which is incorporated by reference, Continental PLLC submitted that First Declaration in conformity with the obligations set forth by the Puerto Rico Recovery Accuracy in Disclosures Act (“PRRADA”) and the Court’s related orders [Docket Nos. 19859, 19980,

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Retention Application.

20419, and 20467], and the Court's March 21 and 30, 2022 direction that that, "to the extent any professional persons (as identified in PRRADA) have already complied with the requirements of Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, any future disclosures by such professional persons as required by PRRADA must supplement, but need not duplicate, what has already been filed by those professional persons." *See* Docket Nos. 20419 and 20467.

6. Pursuant to Paragraph 10 of the First Declaration, Continental files this supplemental disclosure with the Court, which is as follows:

In Continental's role as counsel for the Avoidance Action Trust, Continental may be required to assess and pursue claims against other creditors or parties-in-interest, which may also include claims against members of the Committee. Disclosure of these connections has been made to the Office of the United States Trustee, but is otherwise prohibited by the Stipulated and Agreed Order by and Among Financial Oversight and Management Board, Its Special Claims Committee, and Official Committee of Unsecured Creditors Related to Joint Prosecution of Debtor Causes of Action (Docket #6524).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22th day of June, 2022

John Arrastia

John Arrastia